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16 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC**
COMPANY,

21 **Debtors.**

22 Affects PG&E Corporation
23 Affects Pacific Gas and Electric Company
24 Affects both Debtors

25 * *All papers shall be filed in the lead case,*
No. 19-30088 (DM)

26 Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

27 **STIPULATION AND AGREEMENT FOR**
ORDER FURTHER CONTINUING
HEARING ON MOTION FOR RELIEF
FROM STAY BETWEEN THE UTILITY
AND JH KELLY, LLC

28 [Relates to Dkt. Nos. 5649-5652, 5829]

Regarding Motion Set for Hearing March 25,
2020 at 10:00 a.m. PDT

This stipulation (the “**Stipulation and Agreement for Order**”) is entered into by and between Pacific Gas and Electric Company (the “**Utility**”), as debtor and debtor in possession in the above-captioned cases (the “**Chapter 11 Cases**”), and JH Kelly, LLC (“**JH Kelly**”). The Utility and JH Kelly are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

RECITALS

A. On February 5, 2020, JH Kelly filed the *Motion for Relief from Automatic Stay* [Dkt. 5649] (the “**Motion**”), and the Notice of Hearing on the Motion [Dkt. 5650], which scheduled a hearing on the Motion (the “**Hearing**”) for February 26, 2020 at 10:00 am PST.

B. In the Motion, JH Kelly seeks relief from the automatic stay to permit JH Kelly to move to join the Utility as a party to the litigation pending in the Superior Court of the State of California, County of Shasta, *JH Kelly, LLC v. AECOM Technical Services, Inc., et al.*, Case No. 192600.

C. On February 16, 2020, the Parties filed the *Stipulation and Agreement for Order Continuing Hearing on Motion for Relief from Stay between the Utility and JH Kelly* [Docket No. 5797] (the “**First Stipulation**”), in which they agreed to continue the Hearing to March 25, 2020. On February 19, 2020, the Court approved the First Stipulation. See Dkt. No. 5829.

D. The Parties are continuing to confer regarding a potential resolution to the Motion, and desire to continue the Hearing further while they continue those discussions.

NOW, THEREFORE, IT HEREBY IS STIPULATED AND AGREED BY AND
BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES
JOINTLY REQUEST THE COURT TO ORDER, THAT:

1. This Stipulation shall be effective upon entry of an order by this Court approving it.

2. The March 25, 2020 Hearing shall be continued to April 7, 2020 at 10:00 a.m. PDT.

3. The time in which the Utility is permitted to respond to the Motion is continued to no later than March 26, 2020.

1 4. JH Kelly shall be permitted to file a reply in further support of the Motion
2 no later than April 2, 2020.

3 5. This Court shall retain jurisdiction to resolve any disputes or controversies
4 arising from this Stipulation and Agreement for Order or the order approving it.

5

6 Dated: March 12, 2020

7 WEIL, GOTSHAL & MANGES LLP
8 KELLER BENVENUTTI KIM LLP

9 */s/ Peter J. Benvenutti*

Peter J. Benvenutti

10 *Attorneys for Debtors
and Debtors in Possession*

Dated: March 12, 2020

STOEL RIVES LLP

/s/ David B. Levant

David B. Levant

Attorneys for JH Kelly, LLC